

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Digital Broadcast Content Protection

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MB Docket No. 02-230

**OPPOSITION TO PETITION FOR RECONSIDERATION OF
GENESIS MICROCHIP, INC.
BY THE MOTION PICTURE ASSOCIATION OF AMERICA, INC.**

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March 8, 2004

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In adopting the Broadcast Flag rule, the Commission took an important step to preserve over-the-air digital broadcast television as a viable distribution channel for copyrighted content. An integral piece of such preservation was the imposition of compliance rules for the protection of digital broadcast content in certain regulated devices and their outputs. Although ideally all digital outputs would be protected, the rule grants an exemption for the passing of content to unprotected outputs compatible with the Digital Visual Interface Revision 1.0 Specification (“DVI 1.0”) standard for resolutions no greater than standard digitally encoded component analog video signals. This exemption was also included in the compliance rules jointly proposed in this proceeding by MPAA and others.¹ Previously, at the request of the Commission, the MPAA explained that this limited exemption was made to allow for the continued manufacture of products that are compatible with a certain existing legacy of computer displays with unprotected DVI 1.0 inputs.²

In its petition for reconsideration, Genesis Microchip, Inc. (“Genesis”) objects to the

¹ See Comments of the MPAA, et al., M.B. Docket 02-230 (filed Dec. 6, 2002), Attachment B.

² See Letter from Jon Baumgarten, Counsel to MPAA, to Rick C. Chesson, Associate Bureau Chief, Media Bureau, Oct. 8, 2003, at 4.

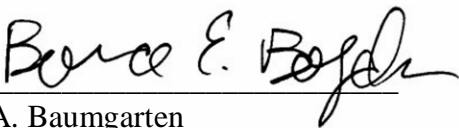
exemption for the DVI 1.0 standard because it is a private industry standard that was not developed, as per Commission practice, by an open standards body. To address its various concerns, Genesis requests that the Commission grant conditional approval of the current version of the unprotected DVI 1.0 digital display interface, subject to a full disclosure and approval by the Commission of patents and licenses required for implementation of such standards and provision for future oversight or modification of the standard consistent with other open standards.

The MPAA is concerned that Genesis's request misinterprets the intent and effect of the DVI 1.0 exemption. The provision to which Genesis objects is merely a limited exemption for only the existing version of the interface — DVI 1.0 — and is not meant to be an evolving exemption for future versions of the DVI 1.0 standard. Rather, it was crafted to ensure compatibility only with legacy display products manufactured with the existing version of DVI 1.0 inputs. Any modifications or updates to the DVI 1.0 standard would no longer be eligible for the exemption; accordingly, Genesis's request for an ongoing DVI 1.0 standard maintenance body is unnecessary, and further action by the Commission with respect to this matter is not merited.

* * *

Respectfully submitted,

MOTION PICTURE ASSOCIATION OF AMERICA, INC.

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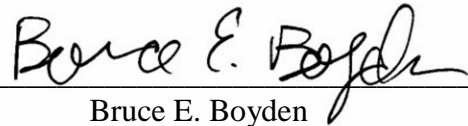
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CERTIFICATE OF SERVICE

I, Bruce E. Boyden, hereby certify that a true and correct copy of the Opposition to Petition for Reconsideration of Genesis Microchip, Inc., by the Motion Picture Association of America, Inc., was served on the following parties on March 8, 2004, by first-class mail, postage prepaid:

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